

# Exhibit F

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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
LAUREN ROLLINS,  
Plaintiff,  
vs. Civil Action No. 3:22-cv-30059  
R STREET INSTITUTE,  
Defendant.  
-----x

DEPOSITION OF  
LAUREN L. ROLLINS  
Wednesday, May 3, 2023  
10:39 a.m.  
Jackson Lewis P.C.  
75 Park Plaza  
Boston, Massachusetts 02116

Laurie K. Langer, RPR

APPEARANCES

ON BEHALF OF THE PLAINTIFF(s):

BY: Deborah McKenna, Esq.

Hayber McKenna & Dinsmore, LLC

472 Wheelers Farm Road

Milford, Connecticut 06461

(203) 691-6491

dmckenna@hayberlawfirm.com

ON BEHALF OF THE DEFENDANT(s):

BY: Benjamin R. Davis, Esq.

JACKSON LEWIS PC

75 Park Plaza

Boston, Massachusetts 02116

(617) 367-0025

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## 1 INDEX OF EXAMINATION

2  
3 WITNESS: Lauren L. Rollins

4 EXAMINATION

PAGE NO.

5 By Mr. Davis

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6  
7 INDEX TO EXHIBITS

8 NO.

DESCRIPTION

PAGE NO.

9 Exhibit 1 Résumé

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10 Exhibit 2 MCAD Charge of Discrimination

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11 Exhibit 3 E-Mail Chain and Attached

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12 Raise Request Memo

13 Exhibit 4 10/17/19 E-Mail to

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14 Erica Schoder

15  
16 (Original exhibits attached to original transcript)

P R O C E E D I N G S

MR. DAVIS: So I don't know if the usual stipulations in Connecticut are the same as Massachusetts, but are you comfortable with all objections, except as to form, being waived until the --

MS. MCKENNA: Yeah.

MR. DAVIS: Reserved until the time of trial. 30 days to read and sign the transcript. And waiving notary.

MS. MCKENNA: Yes, to all three of those.

LAUREN L. ROLLINS,  
having been satisfactorily identified by the production of her driver's license, and duly sworn by the Notary Public, was examined and testified as follows:

EXAMINATION

BY MR. DAVIS:

Q. Good morning, Ms. Rollins.

A. Good morning.

1

REDACTED

15           A.    Okay.    So in terms of the time periods -- I'm  
16   neuro divergent.    So for me to fix months and dates in  
17   time in the past specifically is very difficult for me  
18   without something to cross reference.

19           Q.    Okay.

20           A.    So that is the source of me not being sure about  
21   when exactly.    Also, this was an ongoing process, and I  
22   had to make several requests of different people because  
23   my boss was changing so often.

24           Q.    Yep.

CERTIFICATE

COMMONWEALTH OF MASSACHUSETTS  
SUFFOLK, ss.

I, Laurie Langer, Registered Professional Reporter and Notary Public in and for the Commonwealth of Massachusetts, do hereby certify that the witness whose deposition is hereinbefore set forth, was duly sworn by me and that such deposition is a true record of the testimony given by the witness.

I further certify that I am neither related to or employed by any of the parties in or counsel to this action, nor am I financially interested in the outcome of this action.

In witness whereof, I have hereunto set my hand and seal this 15th day of May, 2023.



NOTARY PUBLIC

Commission Expires  
7/27/2023

DEPOSITION ERRATA SHEET

Our Assignment No: 5896239

Case Caption: Rollins vs. R Street

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury that I have read the entire transcript of my Deposition taken in the captioned matter or the same has been read to me, and the same is true and accurate, save and except for changes and/or corrections, if any, as indicated by me on the DEPOSITION ERRATA SHEET hereof, with the understanding that I offer these changes as if still under oath.

Signed on the \_\_\_\_\_ day of \_\_\_\_\_ 2023

LAUREN L. ROLLINS

## DEPOSITION ERRATA SHEET

Page No. \_\_\_\_\_ Line No. \_\_\_\_\_ Change to: \_\_\_\_\_

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SIGNATURE: \_\_\_\_\_ DATE: \_\_\_\_\_

LAUREN L. ROLLINS

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS  
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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